

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF LOUISIANA  
MONROE DIVISION

STATE OF MISSOURI, *ex rel.*  
ANDREW BAILEY, Attorney  
General, *et al.*

*Plaintiffs,*

v.

JOSEPH R. BIDEN, Jr.,  
in his official capacity as  
President of the United States,  
*et al.*

*Defendants.*

No. 3:22-cv-1213

**MOTION TO WITHDRAW AS COUNSEL**

Attorney Jenin Younes respectfully moves for leave of the Court to withdraw as counsel for Plaintiffs Jayanta Bhattacharya, Jill Hines, Aaron Kheriaty, and Martin Kulldorff.

As of April 13, 2023, Ms. Younes will no longer be affiliated with the New Civil Liberties Alliance (NCLA). Accordingly, Ms. Younes will no longer be able to represent the Plaintiffs in this matter. Mr. Vecchione of NCLA will continue to represent the Plaintiffs. Mr. Vecchione is

admitted to practice before this Court *pro hac vice* and is in good standing.

For all of these reasons, Plaintiffs respectfully requests that this Court grant this unopposed motion for withdrawal.

April 11, 2023

Respectfully submitted,

/s/ Jenin Younes

**Jenin Younes**  
**John J. Vecchione**  
***Of Counsel***

New Civil Liberties Alliance  
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*Attorneys for Plaintiffs*

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2023, an electronic copy of the foregoing motion was filed with the Clerk of the Court using the appellate CM/EFC filing system and that service will be accomplished using the appellate CM/ECF system.

/s/Jenin Younes